

Exhibit B

From: [Phil Luetkehans](#)
To: [Doran, Jennifer V.](#)
Cc: [Bruce Garner](#); [Brian Armstrong](#); [Giovanni Padilla](#); [Bush, Christine K.](#); [Ciotti, Ronald D.](#)
Subject: RE: Separation Agreement between RNA and Centerline # 5 64675961.DOCX
Date: Wednesday, June 12, 2024 12:48:37 PM
Attachments: [image001.png](#)

EXTERNAL EMAIL

Jen,

While RCL may not be officially locked out, your client has locked out 50% of the ownership of RCL, fired RCL's employees and manufacturing product with people that were not RCL employees. None of which has been done by any official Board action – as usual. Your client may have the votes to take action but only when a Board meeting is called. These are significant actions that need Board discussion and approval. Hence, they are and illegal.

As for trying to comply with RCL's obligations, that would have already been complied with except that your client has refused to let my clients do their jobs and operate the facility – including, but not limited to, your client's failure to make payments when owed and not funding the last payroll.

As far as my clients removing property, the only property that they sought and did remove was personal items – not RCL equipment or property. Further, even some of that personal property had been taken.

Phil



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From: Doran, Jennifer V. <jdoran@hinckleyallen.com>
Sent: Wednesday, June 12, 2024 10:34 AM

To: Phil Luetkehans <pal@lbgalaw.com>

Cc: Bruce Garner <beg@lbgalaw.com>; Brian Armstrong <bja@lbgalaw.com>; Giovanni Padilla <GP@LBGALAW.COM>; Bush, Christine K. <cbush@hinckleyallen.com>; Ciotti, Ronald D. <rciotti@hinckleyallen.com>

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Phil,

RCL is not locked out. Steps have been taken to protect RCL's assets and ensure RCL is able to comply with its obligations to avoid delay claims. As you may be aware, clients are asserting that RCL is now late on its deliverables, so the effort is to ensure that RCL complies with its obligations by completing the remaining projects.

We understand that your clients are removing property from RCL's location. This is not authorized – all equipment belongs to RCL and needs to remain at that facility. We further understand that your clients are on their way to the facility now to "take their stuff." Again, the equipment and other property at the facility belongs to RCL, and it must remain at the facility until we agree to the business dissolution. Any breach of the peace will be addressed accordingly.

We reserve all rights.

Thanks,
Jen

Jennifer V. Doran

Partner

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